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Atorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHERMAINE CARROLL,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.)
Case No. 2:17-cv-02237-MMD-PAL
JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL OR REMAND
)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for one week from March 21, 2018 to March 28, 2018. This is Defendant's sixth request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant was sick and had chronic migraines, which impaired her vision at the time of her last extension request. Counsel continues to have chronic debilitating migraines and headaches on the date of the current filing deadline. As a result, Counsel became behind on her heavy caseload, which consists of over 75+

1 District Court cases, which require 2 or more dispositive motions per week and three pending Ninth
2 Circuit matters. In addition, the Ninth Circuit matters require additional levels of review. Counsel
3 has one of her Ninth Circuit matters due for review on the date of the current filing deadline, which
4 she was unaware of at the time of the last extension request. Due to unanticipated leave and heavy
5 workload, Counsel needs additional time to prepare a response to the Motion. Counsel apologizes for
6 the belated request, but was unaware of scheduling conflicts in her other matters and did not expect to
7 take additional sick leave from her chronic migraines. Defendant makes this request in good faith with
8 no intention to unduly delay the proceedings.

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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

2 Respectfully submitted,

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4 Dated: March 21, 2018

5 /s/ *Cyrus Safa
(*as authorized by email on March 21, 2018)
6 CYRUS SAFA
Attorney for Plaintiff

7

8 Dated: March 21, 2018

9 DAYLE ELIESON
10 Acting United States Attorney
11 DEBORAH LEE STACHEL
12 Regional Chief Counsel, Region IX
13 Social Security Administration

14 By

15 /s/ Tina L. Naicker
16 TINA L. NAICKER
17 Special Assistant U.S. Attorney
18 Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:

21 DATED: March 23, 2018

22 
23 THE HONORABLE PEGGY A. LEEN
24 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the
JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND on the date and via
the method of service identified below:

CM/ECF:

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Attorneys for Plaintiff

Respectfully submitted this 21st day of March 2018,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney